

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

THE SOUTH CAROLINA STATE
CONFERENCE OF THE NAACP, and

TAIWAN SCOTT, on behalf of himself and all
other similarly situated persons,

Plaintiffs,

v.

THOMAS C. ALEXANDER, in his official
capacity as President of the Senate; LUKE A.
RANKIN, in his official capacity as Chairman of
the Senate Judiciary Committee; JAMES H.
LUCAS, in his official capacity as Speaker of the
House of Representatives; CHRIS MURPHY, in
his official capacity as Chairman of the House of
Representatives Judiciary Committee;
WALLACE H. JORDAN, in his official capacity
as Chairman of the House of Representatives
Elections Law Subcommittee; HOWARD
KNAPP, in his official capacity as interim
Executive Director of the South Carolina State
Election Commission; JOHN WELLS, Chair,
JOANNE DAY, CLIFFORD J. EDLER, LINDA
MCCALL, and SCOTT MOSELEY, in their
official capacities as members of the South
Carolina Election Commission,

Defendants.

**Case No. 3-21-cv-03302-MGL-
TJH-RMG**

THREE-JUDGE PANEL

**PLAINTIFFS' COUNTER-
DESIGNATIONS AND OBJECTIONS
TO HOUSE AND SENATE
DEFENDANTS' RULE 26(a)(3)(A)(ii)
PRETRIAL DEPOSITION
DESIGNATIONS**

PLAINTIFFS' COUNTER-DESIGNATIONS AND OBJECTIONS TO HOUSE AND SENATE
DEFENDANTS' RULE 26(a)(3)(A)(ii) DEPOSITION DESIGNATIONS
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Pursuant to the April 5, 2022 and May 5, 2022 Scheduling Orders (ECF 210 & 261),
Plaintiffs hereby file Rule 26(a)(3) objections and counter-designations to the Rule 26(a)(3)(A)(ii)
deposition designations of House Defendants (ECF 328) and Senate Defendants (ECF 329-1).

Witness

1. Rep. Neal Collins

Counter-designations: 4:23-5:1, 8:9-9:9, 16:17-21:14, 29:22-31:3, 36:5-42:16, 44:3-
45:22, 47:3-49:21, 51:9-22, 52:2-56:19, 57:2-61:9, 62:17-63:25, 64:12-23, 67:5-12,
68:25-69:7, 70:7-15, 72:21-74:2, 77:14-78:23, 82:5-21, 88:13-94:10, 94:18-96:3, 92:6-
12, 98:14-18, 101:20-106:18, 111:11- 113:12, 115:13-118:14, 119:2-120:13, 120:18-
121:8, 122:1-123:6, 126:4-127:23, 128:10-15, 130:2-13, 130:17-20, 131:7-16, 134:16-
144:18, 144:25-150:18, 153:7-22.

Objections:

166:1-8: Rule 401 (relevance)

166:10 Rule 401(relevance)

166:12-13 Rule 401 (relevance)

166:15-17: Rule 401 (relevance)

166:19-20: Rule 401 (relevance)

167:6-9: Rule 401 (relevance)

167:11-16: Rule 401 (relevance)

2. Benjamin Fifield

Counter-designations: 8:3-9:13, 49:13-51:22, 98:18-114:9, 135:16-19, 139:15-141:8,
145:1-146:8, 167:9-168:19, 175:20-24, 189:16-190:12, 191:24-196:1, 191:9-208:11.

Objections:

General Objection: This testimony is subject to a motion *in limine*.

Specific Objections:

49:5-12: Rule 401 (relevance)

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92:19-93:2: Rule 701 (calls for opinion), Rule 401 (relevance)

95:21-96:5: Argumentative; Rule 401 (relevance)

110:6-16: Rule 701 (calls for opinion), Rule 401 (relevance)

118:23-119:5: Rule 602 (speculation); Rule 701 (calls for opinion), Rule 401 (relevance)

119:6-120:1 Rule 602 (speculation); Rule 701 (calls for opinion), Rule 401 (relevance)

120:3-11: Rule 602 (speculation); Rule 701 (calls for opinion), Rule 401 (relevance)

120:12-120:22: Rule 602 (speculation); Rule 701 (calls for opinion), Rule 401 (relevance)

162:6-162:19: Rule 701 (calls for opinion), Rule 401 (relevance)

162:24-165:14: Rule 701 (calls for opinion), Rule 401 (relevance)

162:15-164:10: Rule 701 (calls for opinion), Rule 401 (relevance)

175:8-18: Rule 701 (calls for opinion), Rule 401 (relevance)

188:3-189:4: Rule 401 (relevance)

189:5-14: Rule 601 (foundation, lack of personal knowledge), Rule 401 (relevance)

192:15-22: Rule 401 (relevance)

193:5-13: Rule 401 (relevance)

193:15-22: Rule 401 (relevance)

193:24-194:7: Rule 401 (relevance)

196:12-20: Rule 401 (relevance)

196:22-197:6: Rule 401 (relevance)

3. Thomas Hauger (6/28/2022)

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Counter-designations: 3:1-21, 7:4-7, 10:4-12:25, 16:14-21, 17:11-22:17, 23:16-25:5, 25:21-24, 26:10-27:10, 28:12-38:22, 39:5-40:17, 41:3-42:10, 44:8-10, 45:11-21, 47:19-22, 50:1-51:14, 52:6-53:17, 53:22-57:3, 57:24-58:11, 58:17-68:4, 69:8-75:22, 76:18-77:4, 77:13-79:25, 80:1-86:23, 88:13-90:21, 91:11-106:13, 107:17-108:9, 110:14-113:15, 114:1-118:2, 118:14-18, 119:1-12, 121:5-14, 122:10-123:12, 124:11-15, 124:16-127:10, 129:1-8, 131:25-132:7, 138:4-139:15, 139:16-19, 141:5-13, 141:14-142:8, 142:9-144:12.

Objections: None

4. Rep. Chris Murphy (6/23/22)

Counter-designations: 6:7-7:10, 8:22-10:10, 13:5-15:2, 15:8-20:3, 21:23-22:13, 23:23-24:10, 25:2-25, 26:6-27:22, 28:8-19, 28:23-29:2, 29:11-30:12, 30:15-33:10, 33:15-34:25, 35:4-37:9, 37:15-38:13, 38:17-40:20, 42:4-12, 42:18-24, 47:1-48:11, 49:10-16, 50:4-7, 50:20-51:2, 51:10-19, 51:21-24, 52:12-56:18, 59:3-67:3, 67:21-73:10, 73:14-75:23, 77:25-79:20, 80:19-82:7, 83:9-24, 84:2-4, 84:22-88:17, 89:16-23, 90:10-93:15, 93:20-94:13, 94:17-95:6, 95:10-96:2, 96:18-103:3, 103:10-104:11.

Objections: None

5. Brenda Murphy

Counter-designations: 21:21-21:24, 32:4-32:19, 34:2-35:3, 39:20-40:21, 44:15-45:6, 48:1-49:25, 50:5-18, 50:22-51:8, 52:1-52:13, 59:13-16, 80:11-13.

Objections:

General Objection: The deponent is on Plaintiffs' will call list and will be available at trial. Accordingly, the deposition designations are hearsay.

Specific Objections:

69:3-18: Rule 704 (calls for legal conclusion), Rule 701(calls for opinion)

69:19-70:10: Rule 704 (calls for legal conclusion), Rule 701(calls for opinion)

80:2-12 – Rule 401 (relevance), 403 (prejudice), Rule 704 (calls for legal conclusion)

6. Brenda Murphy for SC NAACP 30(b)(6)

Counter-designations: 16:25, 23:21-24:1, 25:17-29:4, 31:8-11, 33:24-34:4, 44:17-45:16, 46:1-4, 47:20-48:2, 58:16, 65:25, 79:1-7, 82:3-83:10, 95:22-96:2, 98:5-7, 106:17.

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Objections:

General Objection: The deponent is on Plaintiffs' will call list and will be available at trial. Accordingly, the deposition designations are hearsay.

Specific Objections:

33:10-33:24: Rule 401 (relevance), Rule 602 (Foundation, lack of personal knowledge), calls for speculation, Rule 802 (hearsay)

58:16-23: Form (multiple questions); Rule 401 (relevance), Rule 602 (Foundation, lack of personal knowledge), calls for speculation

65:1-25: Rule 704 (calls for a legal conclusion)

81:9-13: Rule 602 (Foundation, lack of personal knowledge), calls for speculation; Rule 701 (calls for opinion).

106:11-17: Rule 401 (relevance), Rule 602 (Foundation, lack of personal knowledge), calls for speculation; Rule 701 (calls for opinion)

7. Rep. James H. Lucas -- 7/1/22 Transcript

Counter-designations: 4:8-11, 7:12-12:8, 17:13-41:9, 41:17-43:9, 44:2-4, 44:21-48:7, 48:19-54:1, 55:14-61:4, 62:12-71:2, 71:24-72:21, 73:5-11, 73:12-16, 74:4-81:4, 81:25-84:22, 87:3-90:24, 92:1-108:18, 109:7-121:3, 123:7-10.

Objections: None.

8. Emma Dean (7/6/22)

Counter-designations: 7:16-22, 9:10-12:11, 16:16-20, 18:24-19:18, 21:11-50:19, 51:8-111:16, 117:10-119:24.

Objections: None

9. Rep. Justin Bamberg

Counter-designations: 27:16-27:21, 44:13-17, 45:2-46:25, 47:5- 56:12, 56:25-57:15, 58:1-59:18, 60:3-62:17, 65:11-65:22, 71:17-73:23, 77:1-78:2, 84:5-84:14, 85:4-86:17, 87:7-14, 88:6-88:18, 88:25-89:19, 90:11-20, 91:1- 92:21, 93:11-15, 98:19- 99:100:11, 100:24-103:8, 105:17- 110:18, 111:1-113:5, 113:14-113:23, 115:24-116:8, 117:2-6, 117:18-118:6, 118:16-119:9, 120:10-125:7, 125:17-130:20, 131:8-133:1.

Objections: None.

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10. Rep. Weston Newton (6/22/22)

Counter-designations: 7:10-13, 8:14-9:15, 22:6-202:4, 205:7, 208:23.

Objections:

208:10-17: Argumentative

208:19-22: Rule 701 (calls for improper lay opinion), Rule 704 (calls for legal opinion)

11. Rep. Beth Bernstein

Counter-designations: 5:15-23, 14:5-16:3, 23:6-25:24, 26:7-27:11, 40:6-41:23, 45:17-50:4, 51:11-54:14, 55:3-59:14, 59:25-101:12, 101:21-112:3, 113:16-188:5, 188:21-196:10, 196:19-212:7, 213:24-231:24.

Objections:

241:16-19: Rule 701 (calls for improper lay opinion)

263:19-24: Rule 701 (calls for improper lay opinion)

264:11-16: Rule 701 (calls for improper lay opinion)

12. Charles Boykin

Counter-designations: 33:2-36:11, 37:12-42:1, 45:17-22, 50:22-52:13, 54:12-20, 52:23-56:11, 62:20-63:16, 75:6-78:12, 84:12-87:3, 84:12-87:3, 87:4-24, 108:4-110:18.

Objections:

General Objection: This testimony is subject to a motion *in limine*.

Specific Objections: None.

13. Steve Love

Counter-designations: 17:24-20:21, 23:9-24:14.

Objections:

General Objection: This testimony is subject to a motion *in limine*.

Specific Objections: None.

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14. Dr. John Ruoff

Counter-designations: 8:16-24; 15:24-16:7; 16:15-25; 18:15-19:4; 19:12-20; 20-1-12;
22:15-25; 30:12-16; 31:3-5; 32:17-34:3; 34:17-20; 34:25-35:3; 40:25-41:11; 41:25-42-
13; 44:8-11; 44:17-20; 49:23-50:17; 62:13-63:2; 69:9-23; 71:7-9; 73:2-; 74:15-23;
85:12-86:3; 92:3-8; 94:1-14; 95:6-21; 96:3-6; 96:21-22; 97:3-4; 97-8-1; 99:3-1; 100:3-6;
101:6-13; 104:2-5; 107:10-19; 108:1-3; 110:15-21; 111:5-11; 117:25-118:4; 121:7;
121:17; 122:4; 123:12-15; 127:125-128:7.

Objections:

General Objection: This testimony is subject to a motion *in limine*.

Specific Objections:

87:13-88:1: Rule 701 (improper lay testimony); Rule 704 (to the extent it
calls for a legal conclusion)

95:22-96:14: Rule 701 (improper lay testimony); Rule 704 (to the extent it
calls for a legal conclusion); Rule 401 (relevance)

96:16-22: Rule 701 (improper lay testimony); Rule 704 (to the extent it
calls for a legal conclusion); Rule 401 (relevance)

96:23-97:7: Rule 701 (improper lay testimony); Rule 704 (to the extent it
calls for a legal conclusion); Rule 401 (relevance)

110:12-22: Rule 602 (foundation, lack of personal knowledge)

111:1-111:4 Rule 602 (foundation, lack of personal knowledge)

121:3-12: Rule 701 (improper lay testimony); Rule 704 (to the extent it
calls for a legal conclusion); Rule 401 (relevance)

121:14-21: Rule 701 (improper lay testimony); Rule 704 (to the extent it
calls for a legal conclusion); Rule 401 (relevance)

121:23-122:18: Rule 401 (relevance)

129:20-25-132:7 Rule 602 (foundation, lack of personal knowledge); Rule
401 (relevance)

142:23-143:12: Rule 401 (relevance)

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15. Sen. George Campsen

Counter-designations: 8:1-17, 9:3:12, 24:9-25:9, 26:23-27:7, 27:8-13, 27:15-19, 28:2-6, 31:13-33:1, 35:17-36:18, 37:19-24, 38:7-10, 40:13-41:3, 41:18-21, 43:19-23, 43:24-44:4, 44:5-11, 51:4-8, 53:11-16, 57:8-18, 58:17-59:18, 60:9-61:10, 63:17-64:17, 65:8-66:4, 66:10-67:14, 71:16-23, 72:10-73:14, 74:7-15, 74:16-75:4, 75:25-76:5, 78:15-79:14, 80:5-16, 81:23-82:7, 84:1-13, 85:13-23, 87:1-22, 88:22-25, 95:12-17, 96:22-97:10, 97:23-98:4, 101:4-102:6, 103:4-105:4, 106:24-107:1, 108:5-12, 110:1-9, 111:4-6, 114:1-115:8, 115:25-118:20, 119:12-121:25, 123:8-20, 124:10-127:11, 130:13-131:15, 134:11-21, 135:1-137:3, 139:16-140:2, 140:4-13, 142:1-143:13, 145:15-147:2, 147:3-6, 147:7-20, 147:21-148:3, 148:5-7, 148:17-149:12, 149:13-150:3, 151:11-152:2, 154:20-155:11, 156:8-159:3, 159:18-161:23, 165:18-23, 166:2-5, 171:3-8, 176:3-22, 179:18-180:19, 182:8-11, 183:15-186:10, 186:19-187:1, 187:2-5, 188:2-24, 189:12-190:18, 191:12-24, 193:4-194:25, 196:2-198:13, 199:16-200:20, 204:14-208:16, 215:9-18, 215:24-216:1, 216:2-11, 223:3-6.

Objections: None.

16. Andy Fiffick

Counter-designations: 12:23-15:10, 16:5-23, 17:15-16, 18:2-6, 18:12-25, 19:8-25, 20:3-10, 22:2-20, 22:23-23:5, 23:11-20, 24:1-5, 24:16-25:8, 25:15-26:11, 26:19-27:7-13, 27:15-16, 28:7-10, 28:22-25, 29:1-13, 29:14-25, 30:15-33:17, 34:24-35:2, 35:8-36:1, 36:19-37:18, 37:21-38:3, 38:10-39:11, 39:16-42:25, 43:22-44:13, 44:24-45:12, 46:16-19, 50:19-54:18, 58:18-59:2, 59:14-22, 60:2-6, 60:18-61:8, 61:11-15, 62:1-23, 63:3-8, 63:17-64:4, 70:1-15, 71:1-4, 71:12-72:18, 73:19-24, 74:2-77:23, 78:12-19, 78:21-25, 79:2-10, 79:21-22, 80:2-86:20, 87:3-88:5, 88:7-92:11, 93:4-94:10, 94:15-94:25, 95:1-96:3, 96:16-25, 97:8-10, 97:25-98:4, 98:11-21, 99:8-13, 99:24-100:3, 100:10-14, 100:16-101:17, 102:7-12, 103:13-105:7, 105:23-106:16, 107:24-108:17, 109:4-20, 110:21-111:15, 111:17-112:20, 113:21-115:9, 115:20-116:7, 116:21-118:7, 118:17-119:4, 119:9-120:3, 120:5-121:14, 122:4-21, 123:5-130:8, 131:5-132:1, 132:19-133:7, 133:20-135:14, 138:2-141:7, 141:11-14, 142:13-17, 142:21-143:7, 143:9-144:8, 144:23-145:16, 146:5-8, 146:10-12, 146:16-149:2, 149:12-23, 150:3-8, 150:23-151:2, 151:6-152:6, 153:5-155:25, 156:1-13, 156:20-157:1, 159:7-13, 160:12-162:24, 163:2-7, 163:16-164:10, 164:15-25, 165:16-23, 166:10-20, 167:2-169:13, 169:23-170:1, 170:10-19, 171:7-13, 171:17-25, 172:3-9, 172:11-12, 172:14-16, 172:18-177:6, 177:13-179:1, 179:10-25, 180:9-181:13, 181:15-25, 182:10-15, 182:25-183:5, 183:7-217:22, 218:16-222:4, 223:17-224:18, 225:7-227:24, 228:11-231:4, 231:9-232:25, 233:5-23, 234:1-3, 234:12-21, 234:24-235:24, 236:4-237:11, 240:21-241:21, 242:2-13, 243:2-244:21, 245:13-246:13, 246:18-247:2, 247:5-254:4, 254:6-258:24, 259:5-260:22, 261:5-20, 262:1-264:25, 265:16-18, 267:6-268:12, 268:20-269:16, 270:1-15, 270:25-271:10, 272:2-278:4, 279:2-10, 279:22-280:12, 280:25-281:7, 281:15-282:18, 283:3-284:18, 285:5-13, 287:12-22, 288:5, 288:9-12, 289:2-290:25, 291:10-293:23, 294:9-13, 294:24-295:2, 295:4-20, 296:3-17, 296:22-297:13, 297:18-301:4, 301:9-12, 301:14-302:3, 303:12-304:16, 305:3-6, 305:8-12, 305:17-21, 306:1-4, 306:7-12, 306:14-307:9, 307:20-308:11, 309:3-11, 310:8-18, 311:20-

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313:8, 313:20-24, 314:1-5, 314:7-318:10, 318:12-319:16, 319:19-24, 320:1-11, 320:19-321:25, 322:2-324:4, 324:20-325:18, 338:17-24, 357:15-358:7, 358:22-359:2.

Objections:

351:13-17 - Rule 704 (to the extent it calls for a legal conclusion)

356:20-24 - Rule 704 (to the extent it calls for a legal conclusion)

17. Breeden John

Counter-designations: 5:1-5, 7:5-7, 15:19-16:13, 17:22-20:13, 20:14-21:15, 24:14-18, 37:7-17, 44:16-45:8, 45:9-14, 47:21-48:19, 49:24-52:4, 53:6-54:13, 55:2-13, 56:8-10, 59:4-60:6, 61:14-62:14, 63:7-11, 64:16-22, 65:6-8, 65:9-66:25, 67:18-68:5, 70:66-73:8, 78:8-81:14, 83:4-92:25, 93:10-100:21, 100:23-101:19, 102:17-106:20, 107:7-109:2, 109:3-110:3, 111:9-113:5, 113:20-23, 115:15-17, 116:22-118:13, 120:6-20, 120:21-25, 121:15-25, 122:2-5, 122:6-15, 124:2-125:2, 127:4-131:21, 132:10-135:15, 135:16-136:3, 136:4-17, 140:13-142:16, 143:5-18, 143:20-25, 144:23-145:14, 148:21-152:23, 154:19-161:16, 161:23-163:17, 165:20-166:8, 167:22-172:11, 173:4-180:4, 180:13-189:22, 191:20-192:8, 193:9-12, 194:2-7, 195:12-196:20, 198:21-199:12, 199:21-201:2, 201:16-202:17, 203:22-209:23, 211:2-212:16, 213:8-24, 214:24-217:10, 217:11-22, 218:9-220:17, 221:7-222:24, 223:12-227:17, 229:7-231:6, 233:11-235:20, 236:11-238:14, 241:10-22, 242:22-247:20, 264:20-265:2, 277:5-7, 279:20-280:4, 280:12-23, 282:2-289:14, 290:18-292:24.

Objections: None.

18. Adam Kincaid

Counter-designations: 7:13-16, 24:11-30:16, 32:14-39:6, 42:3-46:2, 47:1-50:3, 51:5-22, 54:5-56:1, 57:9-66:21, 67:9-68:6, 71:2-17:13, 73:2-9, 73:12-75:6, 75:18-78:11, 80:10-84:6, 84:10-98:20, 99:11-102:9, 102:17-103:5, 104:14-105:20, 106:2-16, 107:14-108:19, 109:21-22, 110:6-115:13, 117:7-118:6, 118:21-122:3, 122:9-125:7, 125:17-128:19, 135:11-137:8, 140:19-22, 143:17-147:15.

Objections: None

19. Sen. Shane Massey

Counter-designations: 6:11-10:11, 10:16-22, 11:25-13:21, 20:21-22:21, 23:15-25:8, 26:1-33:14, 33:24-34:22, 37:24-41:15, 43:14-44:6, 44:9-45:17, 46:1. 46:14-48:5, 54:13-58:3, 58:22-83:6, 84:19-85:2, 85:14-22, 86:19-87:11, 87:18-95:17, 97:5-104:9, 105:3-107:4, 110:18-112:24, 113:15-115:8, 116:3-25, 117:18-121:12, 121:20-129:1, 129:5-133:23, 133:24-25, 134:12-145:16, 146:9-152:17, 153:9-154:19, 155:9-158:16, 159:5-161:3, 161:18-162:14, 163:9-171:18, 175:20-176:9, 176:18-178:5, 181:4-16, 185:22-

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193:3,224:18-24, 231:7-232:13.

Objections:

152:18-25: Non-responsive; narrative answer.

154:20-25: Narrative answer; non-responsive

162:15-25: Rule 602 (speculation, lack of personal knowledge), narrative answer,
non-responsive

198:1-199:25: Narrative answer.

201: 7-25: Narrative answer

207:1-9: Narrative answer

208:1-20: Narrative answer

210:16-211:25: Narrative answer

216:8-17: Narrative answer

227:1-17: Narrative answer

20. Sen. Luke Rankin

Counter-designations: 4:8-19, 7:19-8:1, 21:16-19, 23:11-22, 24:11-25:21, 28:1-34:7,
36:17-47:4, 48:14-49:16, 50:25-52:7, 53:24-54:12, 55:17-61:23, 64:4-70:18, 71:20-72:10,
84:4-90:19, 93:5-120:4, 123:2-126:22, 130:17-131:5, 137:10-138:15, 141:21-145:25,
148:21-151:24, 154:8-155:5, 155:15-156:6, 157:4-173:24, 174:17-176:1-17, 179:6-
183:11, 185:15-187:2, 187:3-188:10, 188:13-195:3, 195:24-202:18, 202:19-203:25,
204:2-209:12, 212:16-217:25, 225:3-238:25, 240:7-244:24, 248:23-284:20, 286:19-20.

Objections:

287:6-9: Rule 602 (foundation, lack of personal knowledge), Rule 701 (improper
lay testimony)

287:23-288:1: Rule 602 (foundation, lack of personal knowledge), Rule 701
(improper lay testimony)

288:14-18: Rule 602 (foundation, lack of personal knowledge), Rule 701
(improper lay testimony)

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21. Will Roberts

Counter-designations: 4:18-5:2, 7:18-21, 19:5-20:10, 21:13-22:16, 24:1-25, 25:9-20, 25:21-26:13, 26:21-23, 27:4-13, 32:16-33:20, 35:7-14, 35:19-24, 37:18-22, 46:7-12, 46:20-47:4, 48:6-13, 49:10-20, 50:11-17, 51:5-13, 52:24-53:9, 53:19-54:5, 55:10-12, 58:18-23, 59:11-60:2, 61:6-16, 63:20-23, 64:6-8, 64:15-65:5, 65:17-66:12, 68:21-69:13, 69:14-18, 69:19-21, 70:22-71:23, 71:24-72:11, 72:24-73:4, 73:12-77:23, 77:24-81:18, 82:9-84:18, 84:21-25, 85:12-23, 86:6-90:25, 91:18-97:23, 97:25-100:8, 101:3:1-104:20, 105:19-110:3, 113:8-16, 113:17-21, 114:1-117:1, 117:17:17-20, 118:16-24, 119:25-120:12, 121:22-123:8, 127:1-131:2, 131:17-132:21, 132:22-133:7, 133:24-134:2, 134:3-137:15, 137:24-138:3, 139:11-23, 139:24-140:7, 140:19-24, 144:4-8, 147:10-23, 150:19-25, 151:11-15, 152:21-154:2, 154:11-24, 155:23-156:17, 158:4-13, 159:4-9, 159:10-167:13, 168:18-21, 168:22-169:10, 170:6-8, 170:9-171:1, 171:15-19, 172:8-178:20, 179:5-13, 179:23-25, 180:1-181:10, 181:20-24, 181:25-184:4, 184:15-17, 186:2-20, 193:25-195:1, 196:7-199:11, 200:1-202:17, 204:3-208:9, 208:21-210:16, 212:20-221:25, 222:1-22, 223:13-229:24, 234:4-8, 234:19-236:13, 242:21-25, 247:14-248:8, 254:19-22, 255:18-256:4, 257:4-9, 259:14-17, 259:21-260:1, 260:6-261:2.

Objections: None.

22. Taiwan Scott

Counter-designations: 12:1-18, 13:1-15, 14:6-15:19, 16:18-17:5, 18:2-21, 20:8-21:19, 22:9-23:17, 24:2-6, 27:8-19, 33:21-36:7, 37:4-15, 38:1-25.

Objections:

General Objection: The deponent is on Plaintiffs' will call list and will be available at trial. Accordingly, the deposition designations are hearsay.

Specific Objections:

27:8-19: Rule 502 (to the extent it calls for attorney-client communication/privilege)

23. Charles Terreni

Counter-designations: 6:18-23, 12:25-76:15, 77:3-94:22; 96:4-167:3, 172:7-246:3, 246:14-284:10, 284:24-382:24, 411:22-419:21.

Objections: None.

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Dated: September 7, 2022

Respectfully submitted,

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PLAINTIFFS' COUNTER-DESIGNATIONS AND OBJECTIONS TO HOUSE AND SENATE
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PLAINTIFFS' COUNTER-DESIGNATIONS AND OBJECTIONS TO HOUSE AND SENATE
DEFENDANTS' RULE 26(a)(3)(A)(ii) DEPOSITION DESIGNATIONS
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CERTIFICATE OF SERVICE

I hereby certify that on September 7, 2022, a true and correct copy of the foregoing was served on all counsel of record by filing with the Court's CM/ECF service.

/s/ Allen Chaney
Allen Chaney